

Teresa Sabbie, et al., v. Southwestern Correctional, LLC, et al.

No. 5:17-cv-113

Declaration of Edwin S. Budge in Support of The Estate of Michael Sabbie's
Motion to Compel Production of Certain Video Evidence

Exhibit F

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
TEXARKANA DIVISION

TERESA SABBIE, Individually, as §
Personal Representative of the ESTATE §
OF MICHAEL SABBIE, and as parent and §
Natural guardian of her minor children, §
T.S., T.S., and M.S.; SHANYKE NORTON, §
as parent and natural guardian of her §
minor child, M.S.; KIMBERLY WILLIAMS; §
MARCUS SABBIE; and CHARLISA CRUMP, §
Plaintiffs §

v. §

SOUTHWESTERN CORRECTIONAL, LLC §
d/b/a LASALLE CORRECTIONS, LLC and §
LASALLE SOUTHWEST CORRECTIONS; §
LASALLE MANAGEMENT COMPANY, §
LLC; BOWIE COUNTY, TEXAS; the CITY §
of TEXARKANA, ARKANSAS; TIFFANY §
VENABLE, LVN, individually; M. FLINT, §
LVN, individually; GREGORY MONTOYA, §
M.D., individually; CLINT BROWN, §
individually; NATHANIEL JOHNSON, §
individually; BRIAN JONES, individually; §
ROBERT DERRICK, individually; DANIEL §
HOPKINS, individually; STUART BOOZER, §
individually; ANDREW LOMAX, §
individually; SHAWN PALMER, §
individually; SIMONE NASH, individually; §
and JOHN and JANE DOES 1-10, §
Defendants §

No. 5:17-cv-113

DEFENDANTS SOUTHWESTERN CORRECTIONAL, L.L.C D/B/A LASALLE
CORRECTIONS, L.L.C., LASALLE SOUTHWEST CORRECTIONS, AND LASALLE
MANAGEMENT COMPANY, L.L.C.'S
ANSWERS AND RESPONSES TO PLAINTIFFS' FIRST DISCOVERY REQUESTS

Texas Commission on Jail Standards Annual Inspection
U.S. Marshals Service Annual Inspection
State of Arkansas Annual Inspection

REQUEST FOR PRODUCTION NO. 17: Produce all video recordings documenting uses of force in the Bi State Jail since February 2013. “Uses of force” include use of chemical agents, take-downs, pain-compliance techniques, and other uses of force beyond mere escort holds.

RESPONSE:

Defendant objects to Request for Production No. 17 as overbroad and harassing in nature. Plaintiff seeks information that is not relevant to this claim nor calculated to lead to relevant evidence. This request is harassing in nature in that it would require the investigation of the file of every inmate who has ever been housed at the Bi-State Jail for purposes of determining what grievances or use of force may be documented therein.

VERIFICATION

STATE OF Texas

COUNTY OF Bowie

Robert E. Page, being first duly sworn upon oath, deposes and says:

I have read the foregoing answers and responses to these interrogatories and requests for production, know the contents thereof, and believe the same to be true.

Signature: Robert E Page

Name: Robert E Page

Position: Asst. WARDEN

If signing for corporate or municipal entity, name of corporation or municipal entity for whom you are signing: SOUTHWESTERN CORRECTIONAL, L.L.C D/B/A LASALLE CORRECTIONS, L.L.C., LASALLE SOUTHWEST CORRECTIONS, AND LASALLE MANAGEMENT COMPANY, L.L.C.

DATED this 8 day of December, 2017, at Terrell, Texas.